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INTEGRATED MANAGEMENT SYSTEMS

Based on ISO 9001, ISO 45001, ISO14001, &ISO18788

Protection Against Sexual Exploitation and Abuse (PSEA) Policy

	DESIGNATION	SIGN	DATE
Prepared by	Head Of Risk & Compliance		15/09/2025
Reviewed by	Chief Operating Officer		15/09/2025
Approved by	Group Chief Executive Officer		15/09/2025



AMENDMENT SHEET

Issue/ Revision Number	Subject of amendments	Reviewed by		Authorized by		Date
		Name	Sign	Name	Sign	
May 2024/ 00	Initial issue	-	-	-	-	May 2024
Sep 2025/001	Incorporation of ISO 18788					Sep 2025



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OUR VISION

Our vision is to become the leading protection and security service provider in Eastern Africa. We aspire to set the industry standard for excellence, innovation, and reliability, delivering unparalleled security solutions to our clients across the region.

As the preferred choice for protection and security services, we aim to be recognized for our unwavering commitment to customer satisfaction, our uncompromising adherence to the highest professional and ethical standards, and our ability to consistently exceed expectations.

OUR MISSION

Our mission is to become the preferred supplier of domestic, corporate, and banking security and protection solutions in Kenya. We are committed to achieving this objective by continuously investing in and developing our resources, including our people, processes, and technology.

We recognize that the security landscape is ever-evolving, and our customers' needs are diverse and dynamic. Therefore, we strive to stay at the forefront of the industry by constantly enhancing our capabilities and adapting to emerging trends and challenges.

OUR CORE VALUES

❖ Focus

We prioritize our clients' security needs by creating tailor-made security solutions to ensure that their assets and personnel are protected. We are dedicated to providing unparalleled security services that meet and exceed our client's expectations.

❖ Accountability

We believe in taking responsibility for our actions, decisions, and results. Therefore, operating with transparency, honesty, and integrity in all our interactions with our clients, employees, and stakeholders. Our commitment to accountability ensures that our clients can trust us to always act in their best interests.

❖ Reliability

We are committed to delivering reliable security services to our clients. Our experienced and trained security personnel are equipped with the latest technology and techniques to provide comprehensive security solutions that meet and exceed our client's expectations.

❖ Growth

We are committed to growing our business by continually improving our security services and expanding our reach. We embrace innovation and adapt to new challenges to achieve our mission and stay ahead of our competitors.

❖ Organized

We are a well-organized security company that utilizes a structured approach to manage our clients' security needs. We ensure that our personnel, technology, and processes are coordinated and aligned to deliver the best possible security services to our clients.



SEXUAL HARASSMENT POLICY

Introduction

Wells Fargo Limited and Fargo Courier Limited is committed to ensuring that everyone can work without fear of harassment, bullying or intimidation, to secure an environment in which employees are able to flourish and achieve their full potential.

Policy Statement

The company is committed to providing a work environment that is free from all forms of discrimination and conduct that can be considered harassing, coercive, or disruptive, including sexual harassment. The Company finds any form of harassment totally unacceptable and recognizes the adverse effect such behaviour has both on people who work for the Company as well as other stakeholders.

All staff and other stakeholders, have a right to be treated with equal regard, dignity, concern and decency. Any action or inaction, communication or behaviour that could reasonably be interpreted as harassment or bullying is not to be tolerated. Harassment of any kind denies the worth, integrity and dignity of human beings, fails to respect human rights, and may constitute unlawful discrimination. It affects both men and women and no-one should put up with it.

The Company provides impartial processes for dealing with harassment and bullying and assists in the resolution of complaints. Harassment of any kind, if proven, constitutes unacceptable behaviour. The Company will consider disciplinary action if a staff member is found to have engaged in harassment of any kind either against colleagues or other stakeholders

Definition

Harassment is unlawful and consists of any physical or verbal behaviour that is unwelcome, uninvited and unwarranted. It can arise from sexually oriented jokes; innuendo; unnecessary physical contact; requests for sex; displays of offensive material, posters or graffiti; derogatory comments; and offensive messages, emails or telephone calls.

Sexual harassment is defined as unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature that is directly or indirectly subjected to a person. Sexual harassment is most serious when it includes any of the following:

- a) Unwanted sexual advances
- b) An implied or expressed promise of preferential treatment for complying with a sexually oriented request, Making or threatening reprisals after a negative response to sexual advances
- c) Visual conduct that includes leering, making sexual gestures, or displaying of sexually suggestive objects or pictures, cartoons or posters
- d) Verbal conduct that includes making or using derogatory comments, epithets, slurs, or jokes
- e) Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, or suggestive or obscene letters, notes, or invitations
- f) Physical conduct that includes touching, assaulting, or impeding or blocking movements
- g) Actual physical sexual assault or rape.
- h) Mutual social interactions or relationships or freely entered into do not constitute sexual harassment.

Reporting procedure of sexual harassment

- The aggrieved staff shall raise the issue in writing directly to management. The case can be emailed in complete confidence to staff.complaints@fargo.co.ke
- The administrative review and determination of sexual harassment cases once reported shall be taken promptly, but not later than seven (7) working days from the date in which the grievance report is received.
- At all times during the review employees may nominate to have a supporting representative accompany them in any meeting relating to the review.
- If found guilty, the perpetrator shall be dealt with in accordance with the organization's disciplinary procedures after having been given an adequate opportunity to defend himself or herself against the charges.
- Any employee found guilty of sexual harassment shall be guilty of gross misconduct
- Any employee who makes a false allegation of sexual harassment shall also be guilty of gross misconduct and liable to disciplinary action.
- All reports or complaints shall be made as promptly as feasible after the occurrence. (A delay in reporting may be reasonable under some circumstances, as determined on a case-by-case basis. An unreasonable delay in reporting, however, is an appropriate consideration in evaluating the merits of a complaint or report.)

Conditions that Qualify as Harassment

Harassment may be based on racial, tribal, gender, marital status, religious or ethical belief, disability, age, political opinion, employment status, family status, sexual orientation, or involvement in the activities of an employee's organization.

The improper use of power based on administrative or Managerial status (i.e. the use of a position to insult, bully, dominate, manipulate, disadvantage or discriminate) may also constitute harassment.

Bullying – which means repeated, deliberate and targeted conduct by a person towards a member (or members) of the Company which is offensive, intimidating or humiliating and which detrimentally affects that member's well-being.

Romantic and/or sexual relationships between individuals in a supervisory, evaluation, advising, coaching, or counseling relationship constitute a conflict of interest.

The person in the position of higher institutional authority has the responsibility to eliminate the conflict of interest. The conflict of interest must be eliminated in a way which minimizes potential for harming the person with lower institutional authority.

Confidentiality

- The Company is committed to maintaining confidentiality unless there are exceptional circumstances involving probable risk to the safety of any individual, or where maintaining confidentiality would be unlawful.
- Due to the possibility of defamation proceedings, all information must be kept as confidential as possible. Complainants and respondents are advised not to discuss any matters pertaining to a complaint with anyone other than those directly involved.
- The Company observes the principles of natural justice and procedural fairness by ensuring that anyone whose interests may be adversely affected by a complaint is aware of the allegations against them, including the identity of the person making the allegations, and given the opportunity to respond.
- The Company does not act on anonymous complaints.

- The parties involved with or affected by complaints dealt with under these procedures are entitled to a fair hearing and are kept fully informed throughout the process.

Sanctions that May be Applied

- Allegations that are proved true shall be dealt with as per the employee rules on discipline as set out in this manual and the Government of Kenya Employment Act.
- Alleged serious misconduct proved correct may, with the consent of the complainant, be referred to external law enforcement agencies. This would include alleged cases of physical assault, sexual assault and rape.
- Should any person make a complaint that is found to be false or vexatious, sanctions may be applied, through procedures set out in the disciplinary policy part of this manual.
- Failure to prove a claim of harassment is not equivalent to a false allegation.

Representation

At any time during the management of allegations on harassment a complainant or respondent may seek internal representation by any other employee for fairness and objectivity.

False Reporting

Making false or malicious reports under this policy is strictly prohibited and may result in disciplinary action, up to and including termination of employment.

Compliance with Laws

This Sexual Harassment Policy is designed to comply with all relevant laws and regulations in Kenya, including but not limited to Sexual Offences Act, Employment Act and any other relevant laws as may be amended from time to time.

Training and Awareness

Wells Fargo Limited and Fargo Courier Limited will provide training and awareness programs to educate employees and other stakeholders about their rights and obligations under this Policy.

Review and Update

This policy will be reviewed periodically to ensure its effectiveness and compliance with relevant laws and regulations. Amendments may be made as necessary.